

EXHIBIT B

Luis Herrera Time/Billing/Expenses

| <u>Description</u> | <u>Date</u> | <u>Time</u> | <u>Rate</u> | <u>Total</u> |
|--|-------------|-------------|-------------|--------------|
| Client Consult | 3/1/2021 | 1 | \$350.00 | \$350.00 |
| file review and draft initial letter | 4/5/2021 | 1.2 | \$350.00 | \$420.00 |
| phone call with client | 4/12/2021 | 0.5 | \$350.00 | \$175.00 |
| finalize draft letter and mail out | 4/29/2021 | 0.5 | \$350.00 | \$175.00 |
| Phone call with opp counsel (Ed Guardaro from Fullerton Beck) | 5/27/2021 | 0.5 | \$350.00 | \$175.00 |
| follow up email to opp counsel | 6/22/2021 | 0.1 | \$350.00 | \$35.00 |
| file review and draft complaint | 6/23/2021 | 3.5 | \$350.00 | \$1,225.00 |
| research causes of action/statutes | 6/23/2021 | 0.5 | \$350.00 | \$175.00 |
| research various business entities | 6/23/2021 | 1.2 | \$350.00 | \$420.00 |
| prep summonses and civil cover | 6/23/2021 | 0.8 | \$350.00 | \$280.00 |
| file complaint and accompanying documents | 6/29/2021 | 0.75 | \$350.00 | \$262.50 |
| meeting with client and additional potential plaintiffs/witnesses | 8/5/2021 | 2.5 | \$350.00 | \$875.00 |
| Review email form WC attorney re WC hearing for client | 8/11/2021 | 0.4 | \$350.00 | \$140.00 |
| Discussion with WC Attorney re WC hearing and testimony emails to/from Dan Lewis regarding investigation and location of Peter Glass | 8/11/2021 | 0.4 | \$350.00 | \$140.00 |
| phone call with investigator Dan Lewis DPIdentity | 8/31/2021 | 0.5 | \$350.00 | \$175.00 |
| | 9/1/2021 | 0.75 | \$350.00 | \$262.50 |
| discussion with Dan Lewis regarding continued investigation of Peter and Paula Glass and aliases/addresses | 9/8/2021 | 0.5 | \$350.00 | \$175.00 |
| Phone calls with, and emails to/from Process service Company TMS to have Peter Glass and Jermyn Contracting served review of investigation pictures/notes from Dan Lewis | 9/8/2021 | 0.25 | \$350.00 | \$87.50 |
| | 9/10/2021 | 1 | \$350.00 | \$350.00 |
| email to TMS to follow up on affidavits of non serve for individual Peter Glass at same TPL as attempts on Jermyn | 9/13/2021 | 0.2 | \$350.00 | \$70.00 |

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| email to/from investigator regarding report letter to judge Briccetti (ended up not being necessary due to TMS service) | 9/16/2021 | 0.2 | \$350.00 | \$70.00 |
| | 9/21/2021 | 0.75 | \$350.00 | \$262.50 |
| phone call with service agent re service on Jermyn and Glass | 9/22/2021 | 0.3 | \$350.00 | \$105.00 |
| Prep request for cert and affirmation | 9/22/2021 | 0.4 | \$350.00 | \$140.00 |
| ECF File request for cert and aff in support | 9/22/2021 | 0.2 | \$350.00 | \$70.00 |
| Deficiency correction and refile Proposed Cert | 9/22/2021 | 0.2 | \$350.00 | \$70.00 |
| certificate of default issued - saved to file | 9/23/2021 | 0.2 | \$350.00 | \$70.00 |
| prepare motion documents (notice, delcaration, affirmation, research) | 10/6/2021 | 2.2 | \$350.00 | \$770.00 |
| phone call with client (privileged) | 10/7/2021 | 0.2 | \$350.00 | \$70.00 |
| draft memo of law | 10/8/2021 | 1.8 | \$350.00 | \$630.00 |
| Research and edits to memo and accompany motion docs | 10/10/2021 | 1.2 | \$350.00 | \$420.00 |
| filing OSC (default judgment) | 10/10/2021 | 0.5 | \$350.00 | \$175.00 |
| refile docs | 10/12/2021 | 0.3 | \$350.00 | \$105.00 |
| prepare and serve all OSC docs on Defendants | 11/5/2021 | 0.3 | \$350.00 | \$105.00 |
| prepare updated time notice via judge's text order to be served on all defendants | 11/29/2021 | 0.4 | \$350.00 | \$140.00 |
| Court appearance - telephonic appearance for OSC default | 12/6/2021 | 0.75 | \$350.00 | \$262.50 |
| research on service of Jermyn via Sec of State under Business law (Sec 307) | 12/15/2021 | 1 | \$350.00 | \$350.00 |
| email to process server with instructions to serve Jermyn contracting via Sec of State and then reg mail RRR to effectuate service | 12/15/2021 | 0.25 | \$350.00 | \$87.50 |
| Prepare and file proposed clerk's default papers on Peter Glass | 12/21/2021 | 0.75 | \$350.00 | \$262.50 |
| prepare and file Affidavit for Clerk Default against Peter Glass | 12/22/2021 | 0.25 | \$350.00 | \$87.50 |
| Follow up with Judgements clerk re Clerk's certificate of default | 12/28/2021 | 0.2 | \$350.00 | \$70.00 |

Email to WC attorney explaining circumstances of case and Defaults

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| Follow up emails to WC counsel re client documents | 1/3/2022 | 0.75 | \$385.00 | \$288.75 |
| Phone call with client (explaining all circumstances) | 1/11/2022 | 0.25 | \$385.00 | \$96.25 |
| Prepare request for clerk's default Jermyn and efile | 1/13/2022 | 1 | \$385.00 | \$385.00 |
| Prepare second Plaintiff declaration | 1/13/2022 | 1.5 | \$385.00 | \$577.50 |
| Prepare default order to show cause docs | 1/28/2022 | 0.4 | \$385.00 | \$154.00 |
| efile updated OSC (default judgment) | 1/28/2022 | 1.8 | \$385.00 | \$693.00 |
| Deficiency correction and refile Proposed Order | 2/1/2022 | 0.5 | \$385.00 | \$192.50 |
| Review order on initial filing of OSC | 2/2/2022 | 0.5 | \$385.00 | \$192.50 |
| Affidavit of service and efile aff per Judge's order | 2/14/2022 | 0.25 | \$385.00 | \$96.25 |
| Travel to White Plains for court appearance | 2/16/2022 | 0.25 | \$385.00 | \$96.25 |
| Appearance on Default OSC | 3/4/2022 | 1.5 | \$385.00 | \$577.50 |
| Travel home from White Plains | 3/4/2022 | 0.75 | \$385.00 | \$288.75 |
| Review Order from Judge Davison | 3/4/2022 | 1.5 | \$385.00 | \$577.50 |
| Draft inquest docs | 3/31/2022 | 0.25 | \$385.00 | \$96.25 |
| research inquest format/law for Judge Davison | 4/18/2022 | 1.4 | \$385.00 | \$539.00 |
| continued draft inquest docs (declarations) | 4/18/2022 | 1 | \$385.00 | \$385.00 |
| | 4/19/2022 | 1.75 | \$385.00 | \$673.75 |
| emails to/from client regarding declaration and translation | 5/20/2022 | 0.7 | \$385.00 | \$269.50 |
| finalize attorney declaration in support of damages | 5/20/2022 | 0.5 | \$385.00 | \$192.50 |
| memo of law | 5/24/2022 | 1.4 | \$385.00 | \$539.00 |
| finalize memo of law | 5/27/2022 | 1.2 | \$385.00 | \$462.00 |
| efile inquest documents | 5/27/2022 | 0.4 | \$385.00 | \$154.00 |

Total Hours:

48.95 Total Fees:

\$17,816.75

Expenses

Mail out intent to sue letter
SDNY filing fee
service of summons and complaint
train to city to meet with client + 2 other witnesses
DPI Identity Fee for investigation

4/29/2021 FLAT
6/29/2021 FLAT
7/8/2021 FLAT
8/5/2021 FLAT
9/13/2021 FLAT

\$5.15
\$402.00
\$1,204.00
\$9.25
\$175.00

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|--|------------|------|------------|
| Service of OSC on Defendants (mail) | 11/5/2021 | FLAT | \$8.00 |
| Service of updated conference date on all defendants | 11/29/2021 | FLAT | \$2.00 |
| additional service against Jermyn (DOS + RRR) | 1/6/2022 | FLAT | \$123.00 |
| Total Costs: | | | \$1,928.40 |